

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DRAGON INTELLECTUAL PROPERTY,
LLC

Plaintiff,

v.

SIRIUS XM RADIO INC.,

Defendant.

C.A. No. 13-2067 (RGA)

**DRAGON INTELLECTUAL PROPERTY, LLC'S RESPONSE TO
SIRIUS XM RADIO INC.'S APPLICATION FOR ATTORNEYS' FEES AND COSTS**

Dated: December 22, 2021

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*Attorneys for Plaintiff Dragon
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I. NATURE AND STAGE OF PROCEEDINGS

Plaintiff Dragon Intellectual Property, LLC (“Dragon”) submits this response to Defendant Sirius XM Radio Inc.’s Application for Attorneys’ Fees and Costs (D.I. 234).

II. ARGUMENT

Dragon makes no argument regarding the specific calculation of fees as set forth in Defendant’s Application. To ensure that Dragon preserves all rights, however, Dragon reiterates its objections to the Court’s prior decision that the case is exceptional and the award of any attorneys’ fees or costs related to this action (D.I. 231), along with the Magistrate Judge’s earlier Report and Recommendation regarding those issues (D.I. 223). Dragon reserves all rights to appeal those Orders, any findings in those Orders, and the award of any fees or costs (and reserves all rights to appeal any other Orders and findings in the action).

Dated: December 22, 2021

DEVLIN LAW FIRM LLC

By: /s/ Timothy Devlin
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CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Timothy Devlin
Timothy Devlin